

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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WENTWORTH RATTRAY,

Plaintiff,

-against-

POLICE OFFICER JOSE CADAVID, POLICE OFFICER
ALYSSA TRIGUENO

Defendants.
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**DECLARATION OF
ANDREY UDALOV IN
SUPPORT OF
DEFENDANTS' MOTION
FOR SUMMARY
JUDGMENT**

17-CV-8560 (PGG) (KHP)

ANDREY UDALOV, declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am an Assistant Corporation Counsel in the Office of Georgia M. Pestana, Corporation Counsel of the City of New York, attorney for defendants Police Officer Jose Cadavid and Police Officer Alyssa Trigueno. As such, I am familiar with the facts stated below and submit this declaration to place on the record the relevant documents in support of defendants' motion pursuant to Rule 56(a) of the Federal Rules of Civil Procedure.

2. Attached as Exhibit A is a true and correct copy of Police Officer Jose Cadavid's deposition transcript taken by plaintiff on August 13, 2021.

3. Attached as Exhibit B is a true and correct copy of Police Officer Alyssa Trigueno's deposition transcript taken by plaintiff on September 20, 2021.

4. Attached as Exhibit C is a true and correct copy of plaintiff deposition transcript taken by defendants on July 30, 2021.

5. Attached as Exhibit D is a true and correct copy of the Event Chronology Report pertaining to the November 5, 2016 incident previously disclosed by defendants to plaintiff as D_00001 - D_00003.

6. Attached as Exhibit E are true and correct copies of plaintiff's emails dated November 4-6, 2016.

7. Attached as Exhibit F is a true and correct copy of the domestic incident report completed by Ms. Sandy on November 5, 2016 previously disclosed by defendants to plaintiff as D_00068 – D_00070.

DATED: New York, New York
April 15, 2022

HON. SYLVIA O. HINDS-RADIX

Corporation Counsel of the City of New York
*Attorney for Defendants Police Officer Jose
Cadavid and Police Officer Alyssa Trigueno*
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By: /s/ *Andrey Udalov*
Andrey Udalov
Assistant Corporation Counsel